Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	
WWAZ LICENSE, LLC	**MB Docket No.:** _____
	RM-_____
To Amend the Post-Transition Digital Television Table of Allotment for Station WWAZ-DT, Fon du Lac, WI	

To: The Secretary
Attn: Chief, Video Division
Media Bureau

ORIGINAL

PETITION FOR RULEMAKING

WWAZ License, LLC ("Petitioner"), by and through its attorneys, and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. § 73.623 (2007), hereby submits this Petition for Rulemaking to change the post-transition digital television ("DTV") channel allotment of Station WWAZ-DT, Fond du Lac, Wisconsin (the "Station") to Channel 9, and to make related technical changes to the Station's technical parameters. This Petition is submitted pursuant to the Public Notice, dated May 30, 2008, lifting the freeze on the submission of DTV "maximization" applications and petitions for digital channel substitutions.[1]

Currently, the Station has been allotted Channel 44 in the post-transition DTV Table of Allotments.[2] As set forth in the Engineering Statement, attached hereto as Exhibit A, Petitioner has determined that the requested change in the post-transition DTV allotment to Channel 9 complies with the Commission's technical rules. Furthermore, the change in the Station's post-

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1 *Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately*, Public Notice, DA 08-1213 (May 30, 2008).

2 *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order, Appendix B, 22 FCC Rcd 15,581 (2007)("DTV Order"). The post-transition parameters for DTV facilities specified in Appendix B will be codified at 47 C.F.R. § 73.622(i). *Id.*, nt. 2.

transition DTV Channel will eliminate the technical requirement that the Station co-locate with Station WWRS-DT, Mayville, Wisconsin, to avoid adjacent-channel interference between the two stations.

Moreover, as shown in the Engineering Statement, the change to DTV Channel 9, and the related technical changes, will permit the Station to serve twice the number of Hispanic viewers (the Station is a Spanish language station) than it could serve with the post-transition DTV allotment of Channel 44 at the co-located site with Station WWRS-DT. Finally, the proposed facility complies with the Commission's processing guidelines established in the DTV Order regarding the permissible change in a post-transition DTV facility.

Therefore, Petitioner respectfully requests that the post-transition DTV Table of Allotments be amended for WWAZ-DT to specify Channel 9 and the technical parameters provided in the Engineering Statement. The requested changes comply with all applicable legal and technical requirements and would serve the public interest.

Respectfully submitted,

WWAZ LICENSE, LLC

By: _____

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Lee G. Petro, Esquire
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Its Attorneys

June 19, 2008

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, licensee of WWAZ-DT on Channel 44 in Fond du Lac, Wisconsin, in support of its Petition for Rulemaking to substitute Channel 9 for Channel 44 in the Commission's Digital Television Table of Allotments for post-transition operation.

WWAZ-DT was allotted DTV Channel 44 at the authorized WWAZ site. Due to the need to relocate the transmitting facility to a site which will better cover the intended Spanish-language audience and the fact that Channel 44 must be essentially co-located with WWRS-DT on Channel 43 in Mayville, Wisconsin, in order to avoid mutually-destructive interference between the two stations, it is proposed herein to change the assigned parameters of WWAZ-DT to operate on DTV Channel 9 and relocate the antenna to the tower which supports WMVS-DT, Channel 8 in Milwaukee, Wisconsin, with sufficient power and height to allow coverage of Fond du Lac with the requisite city-grade contour. Co-located operation with WMVS-DT will eliminate mutually destructive interference between WMVS-DT and proposed WWAZ-DT on Channel 9. Attached is a map on which the licensed Channel 44 and proposed Channel 9 service contours of WWAZ-DT are shown. Hispanic population within the two contours, included in that exhibit, reveals that the proposed Channel 9 facility will provide service to more than twice the Hispanic population as that of the presently licensed Channel 44 facility.

Attached is the engineering portion of an FCC application for the proposed operation on Channel 9. In it, the operating parameters of the station are provided. As

shown in the engineering report, operation on the new channel with the specified parameters will result in a facility that places the requisite city-grade contour over the city of license, meets the FCC's interference requirements to all post-transition DTV facilities (and Class A LPTV stations) except one, and satisfies the Commission's human exposure guidelines to nonionizing electromagnetic radiation.

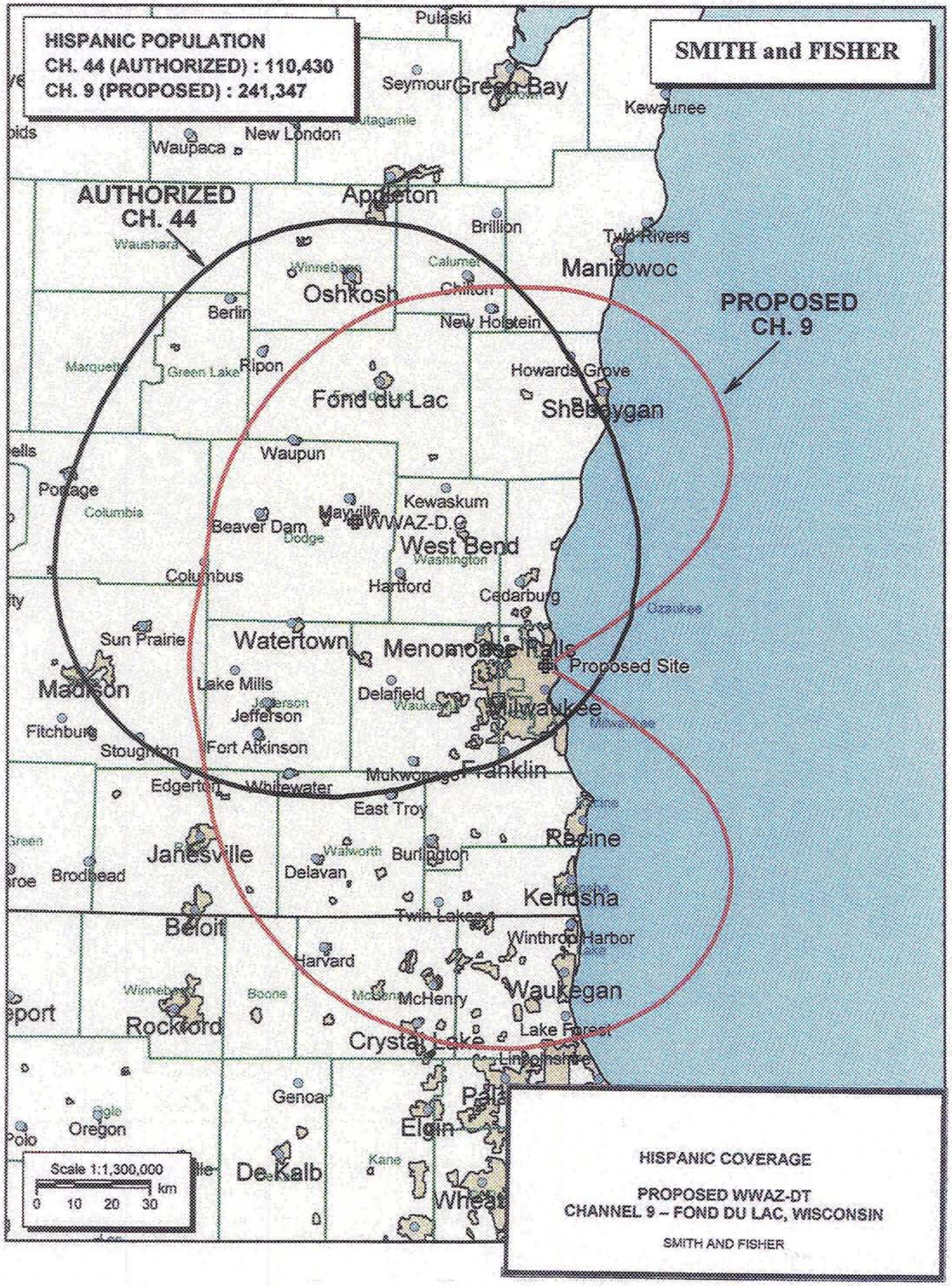
Accordingly, it is respectfully requested that the Commission substitute the allotment channel for WWAZ-DT (with the specified operating parameters) in the digital television allotment table in Section 73.622(i) of the FCC Rules as follows:

Present Allotment	Proposed Allotment
Fond du Lac, WI 44	Fond du Lac, WI 9

I declare, under penalty of perjury, that the foregoing statements and attached engineering report, which was prepared by me, is true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 16, 2008


HISPANIC POPULATION
CH. 44 (AUTHORIZED) : 110,430
CH. 9 (PROPOSED) : 241,347
SMITH and FISHER
AUTHORIZED
CH. 44
PROPOSED
CH. 9
Pulaski
Seymour
Green Bay
Kewaunee
New London
Waupaca
Appleton
Brillion
Two Rivers
Manitowoc
Oshkosh
Berlin
New Holstein
Ripon
Howards Grove
Fond du Lac
Sheboygan
Waupun
Portage
Columbia
Kewaskum
Beaver Dam
WWAZ-D.C.
West Bend
Columbus
Hartford
Cedarburg
Ozaukee
Sun Prairie
Watertown
Menomonee Falls
Proposed Site
Madison
Lake Mills
Delafield
Jefferson
Milwaukee
Fitchburg
Stoughton
Fort Atkinson
Edgerton
Whitewater
East Troy
Racine
Janesville
Walworth
Burlington
Delavan
Kenosha
Brodhead
Beloit
Twin Lakes
Winthrop Harbor
Harvard
Waukegan
McHenry
Rockford
Lake Forest
Crystal Lake
Lincolnshire
Genoa
Elgin
Oregon
DeKalb
Kane
Scale 1:1,300,000
km
0 10 20 30
HISPANIC COVERAGE
PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN
SMITH AND FISHER

Section III - D - DTV Engineering

Complete Questions 1-5 and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Pre-Transition Certification Checklist: An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

Post-Transition Expedited Processing. An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed on or before March 17, 2008 (45 days of the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91).

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

   (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No

   (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"). ☐ Yes ☐ No ☒ N/A

   (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the DTV Table Appendix B. ☐ Yes ☐ No ☒ N/A

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No

   Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No

4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No

5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

Section III - D DTV Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV 9 Analog TV, if any 68

2. Zone: [X] I [ ] II [ ] III

3. Antenna Location Coordinates: (NAD 27)

   43° 05' 46" [X] N [ ] S Latitude

   87° 54' 15" [ ] E [X] W Longitude

4. Antenna Structure Registration Number: 1057482

   [ ] Not applicable [ ] FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 191.4 meters

6. Overall Tower Height Above Ground Level: 369.7 meters

7. Height of Radiation Center Above Ground Level: 362 meters

8. Height of Radiation Center Above Average Terrain: 354 meters

9. Maximum Effective Radiated Power (average power): 28 kW

10. Antenna Specifications:

	Manufacturer	Model
a.	Dielectric	THA-MC-6/12-1

b. Electrical Beam Tilt: 0.6 degrees [ ] Not Applicable

c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True [X] Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685(c). Exhibit No. B

d. Polarization: [X] Horizontal [ ] Circular [ ] Elliptical

TECH BOX

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)

Rotation: _____° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.772	60	0.010	120	0.010	180	0.772	240	0.772	300	0.772
10	0.619	70	0.010	130	0.043	190	0.894	250	0.617	310	0.894
20	0.451	80	0.010	140	0.145	200	0.973	260	0.559	320	0.973
30	0.287	90	0.010	150	0.287	210	1.000	270	0.574	330	1.000
40	0.145	100	0.010	160	0.451	220	0.973	280	0.559	340	0.973
50	0.043	110	0.010	170	0.619	230	0.894	290	0.617	350	0.894
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.** Exhibit No. B

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616? ☒ Yes ☐ No

    If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers. Exhibit No. D

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.") Exhibit No. C

13. **Environmental Protection Act. Submit in an Exhibit** the following: Exhibit No. E

    a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

    By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

    If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

☐ Yes ☐ No ☐ N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	**Date**

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name	Relationship to Applicant (e.g., Consulting Engineer)	
KEVIN T. FISHER	Broadcast Consultant	
Signature	**Date**	
	June 15, 2008	
Mailing Address		
SMITH and FISHER, 2237 Tackett's Mill Drive, Suite A		
City	**State or Country (if foreign address)**	**ZIP Code**
Lake Ridge	Virginia	22191
Telephone Number (include area code)	**E-Mail Address (if available)**	
(703) 494-2101	Kevin@smithandfisher.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, licensee of WWAZ-DT in Fond du Lac, Wisconsin, in support of its Application for Construction Permit to operate with a maximized post-transition DTV facility on Channel 9. This application is being filed with the parameters specified in the station's Petition for Rulemaking.

It is proposed to mount a standard Dielectric directional antenna at the 362-meter level of an existing 370-meter tower in the Milwaukee antenna farm. Exhibit B provides elevation and azimuth pattern data for the proposed antenna. Proposed operating parameters are provided in Exhibit C. Exhibit D is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 43 dBu service contour. An interference study is included in Exhibit E, and it is important to note that the study utilized a cell size of 1.0 kilometers and an increment spacing of 0.1 kilometers. A power density calculation is provided in Exhibit F.

It is important to note that, while the proposed effective radiated power of 28 kw exceeds that allowable in Section 73.622(f)(7)(i) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (WMVS-DT, Channel 8 in Milwaukee, Wisconsin), as allowed in Section 73.622(f)(5) of the Rules.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the new

EXHIBIT A

WWAZ-DT site. However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. The FCC issued Antenna Structure Registration Number 1057482 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

June 16, 2008

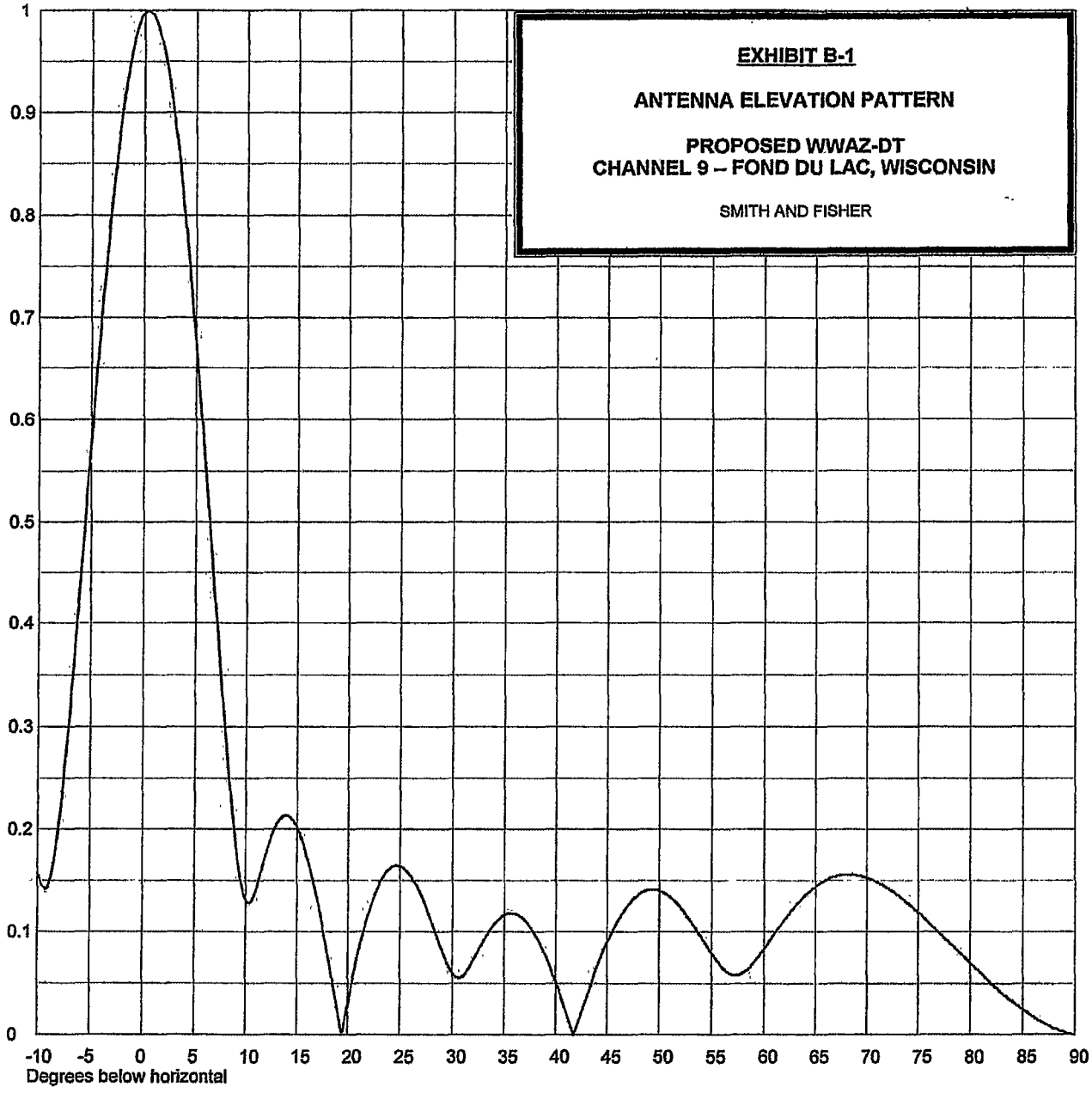
EXHIBIT NO.

Dielectric

Date 25 Oct 2007
Call Letters Channel 9
Location FOND DU LAC, WI
Customer
Antenna Type THA-MC-6/12-1

ELEVATION PATTERN

RMS Gain at Main Lobe	6.0 (7.78 dB)	Beam Tilt	0.60 Degrees
RMS Gain at Horizontal	6.0 (7.78 dB)	Frequency	189.00 MHz
Calculated / Measured	Calculated	Drawing #	06H060060-90



Remarks:

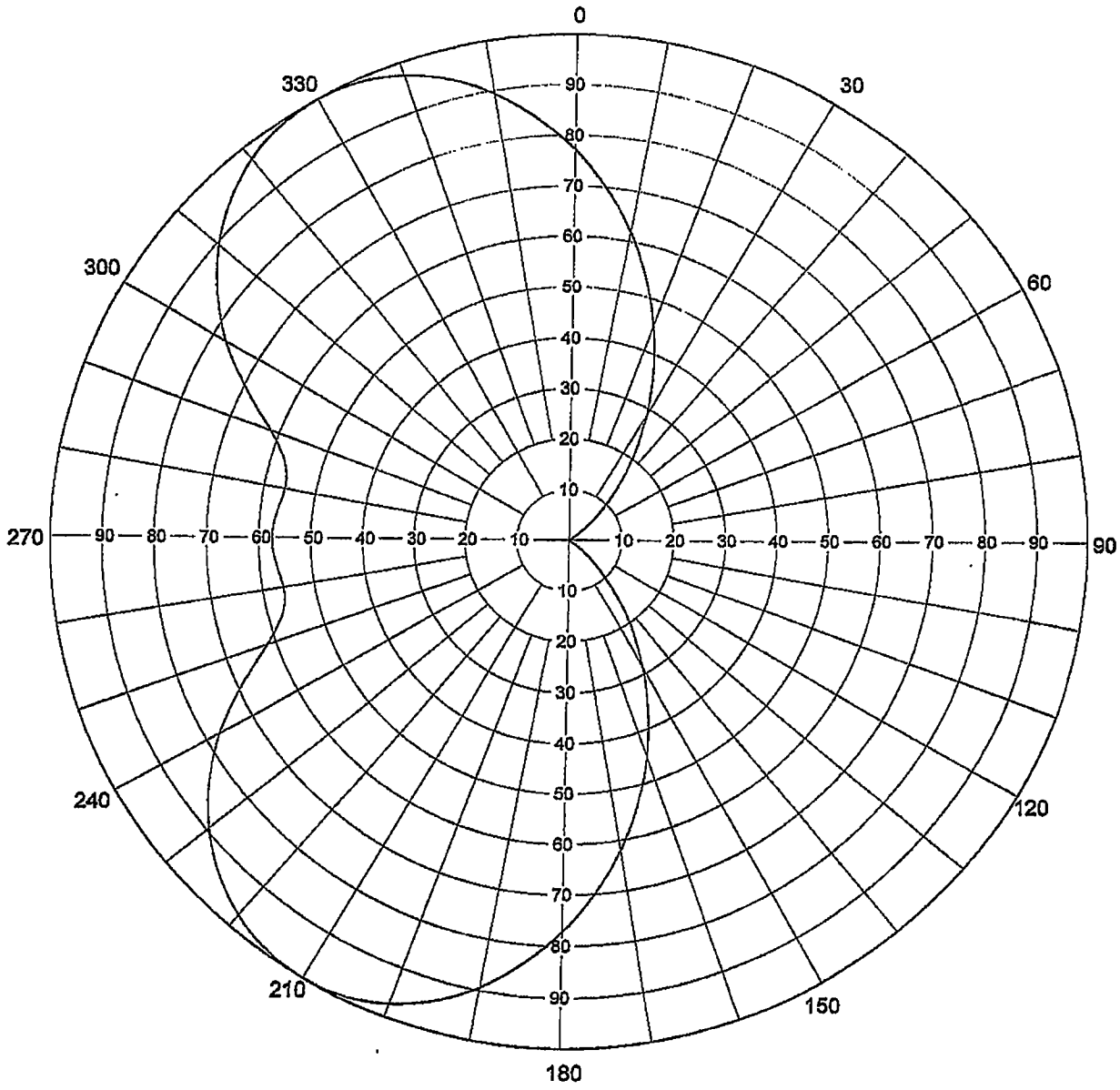
Exhibit No.

Dielectric

Date 25 Oct 2007
Call Letters Channel 9
Location FOND DU LAC, WI
Customer
Antenna Type THA-MC-6/12-1

AZIMUTH PATTERN

Gain	2.50 (3.98 dB)	Frequency	189 MHz
Calculated / Measured	Calculated	Drawing #	THA-MC2



Remarks:

EXHIBIT B-2

ANTENNA AZIMUTH PATTERN

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

SMITH AND FISHER

EXHIBIT NO.

Dielectric

Date 25 Oct 2007
Call Letters Channel 9
Location FOND DU LAC, WI
Customer
Antenna Type THA-MC-6/12-1

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # THA-MC2

Angle	Field	ERP (kW)	ERP (dBk)
0	0.772	16.7	12.22
10	0.619	10.7	10.31
20	0.451	5.7	7.56
30	0.287	2.3	3.63
40	0.145	0.6	-2.30
50	0.043	0.1	-12.86
60	0.000	0.0	0.00
70	0.000	0.0	0.00
80	0.000	0.0	0.00
90	0.000	0.0	0.00
100	0.000	0.0	0.00
110	0.000	0.0	0.00
120	0.000	0.0	0.00
130	0.043	0.1	-12.86
140	0.145	0.6	-2.30
150	0.287	2.3	3.63
160	0.451	5.7	7.56
170	0.619	10.7	10.31
180	0.772	16.7	12.22
190	0.894	22.4	13.50
200	0.973	26.5	14.23
210	1.000	28.0	14.47
220	0.973	26.5	14.23
230	0.894	22.4	13.50
240	0.772	16.7	12.22
250	0.617	10.7	10.28
260	0.559	8.7	9.42
270	0.574	9.2	9.65
280	0.559	8.7	9.42
290	0.617	10.7	10.28
300	0.772	16.7	12.22
310	0.894	22.4	13.50
320	0.973	26.5	14.23
330	1.000	28.0	14.47
340	0.973	26.5	14.23
350	0.894	22.4	13.50

Maxima

Angle	Field	ERP (kW)	ERP (dBk)
0	0.772	16.7	12.22
210	1.000	28.0	14.47
270	0.574	9.2	9.65
330	1.000	28.0	14.47

Minima

Angle	Field	ERP (kW)	ERP (dBk)
90	0.000	0.0	0.00
259	0.559	8.7	9.42
281	0.559	8.7	9.42

EXHIBIT B-3

ANTENNA RELATIVE FIELD VALUES

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

SMITH AND FISHER

Remarks:

EXHIBIT C

PROPOSED OPERATING PARAMETERS

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

ERP (main-lobe, maximum)	28 kw
Site Elevation AMSL	191.4 meters
Overall Structure Height AGL	369.7 meters
Radiation Center Height AGL	362.1 meters
Radiation Center Height AMSL	553.5 meters
Radiation Center Height AAT	354 meters
Antenna Structure Registration Number	1057482
Antenna Make and Model	Dielectric THA-MC-6/12-1
Orientation	270° T*
Beam Tilt	0.6 degrees
Geographic Coordinates	43-05-46 N 87-54-15 W
NTSC Channel	68
FCC Facility ID Number	60571

*line of symmetry

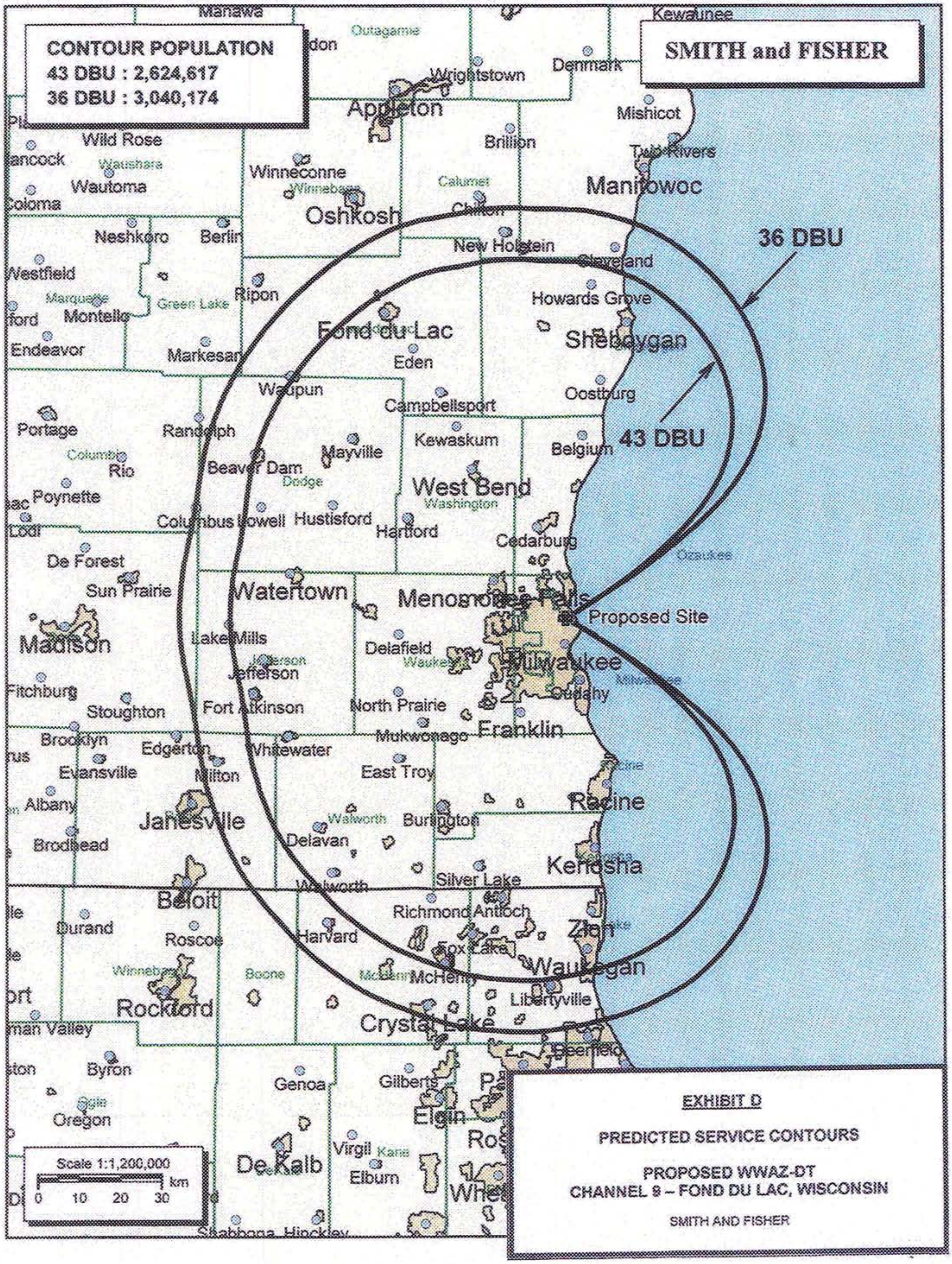

CONTOUR POPULATION
43 DBU : 2,624,617
36 DBU : 3,040,174
SMITH and FISHER
36 DBU
43 DBU
Proposed Site
Appleton
Oshkosh
Manitowoc
Fond du Lac
Sheboygan
West Bend
Watertown
Menomonee Falls
Milwaukee
Madison
Janesville
Racine
Kenosha
Waukegan
Rockford
Beloit
Crystal Lake
Elgin
De Kalb
Franklin
Scale 1:1,200,000
0 10 20 30 km
EXHIBIT D
PREDICTED SERVICE CONTOURS
PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN
SMITH AND FISHER

EXHIBIT E-1

INTERFERENCE STUDY

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

The instant proposal specifies an ERP of 28 kw (directional) at 354 meters above average terrain, which we have determined to be allowable under the FCC's proposed interference standard with respect to various DTV facilities, except one.

We looked at the interference situation with respect to facilities as they will exist on or before February 17, 2009, the date by which all stations will be operating with the digital facilities recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 1.0 kilometers and an increment spacing of 0.1 kilometer along each radial. In addition, we utilized the 2000 U.S. Census. Changes in interference caused by proposed WWAZ-DT to other pertinent stations are tabulated in Exhibit E-2.

As shown, the proposed WWAZ-DT facility would not cause significant interference to the service population of any post-transition facility except for WAOW-DT, Channel 9 in Wausau, Wisconsin. That station is predicted to receive interference to 1.0 percent of its service population, and a waiver of the Commission's interference policy with respect to WAOW-DT is respectfully requested. It is important to note that the proponent is attempting to negotiate an interference agreement from the owners of WAOW-DT. Once the agreement is secured, it will be filed as a supplement to this Petition.

EXHIBIT E-1

A Longley-Rice interference study also reveals that the proposed WWAZ-DT facility does not cause interference within the protected 74 dBu contour of any potentially affected Class A low power television station.

EXHIBIT E-2

INTERFERENCE STUDY SUMMARY

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

Call Sign	City, State	CH.	Coverage Population	Interference Population From WWAZ-DT	%
KCRG-DT (Allot.)	Cedar Rapids, IA	9	981,538	1,866	0.2
WILL-DT (Allot.)	Urbana, IL	9	1,113,943	592	<0.1
WAOW-DT (CP)	Wausau, WI	9	528,385	5,944	1.1
WAOW-DT (Allot.)	Wausau, WI	9	530,567	6,219	1.1

EXHIBIT F

POWER DENSITY CALCULATION

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Fond du Lac facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 28 kw, an antenna radiation center 362 meters above ground, and the vertical pattern of the Dielectric antenna, maximum power density two meters above ground of 0.00016 mw/cm^2 is calculated to occur 145 meters west of the base of the tower. Since this is significantly less than 0.1 percent of the 0.2 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 9 (186-192 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.